# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

FREEDOM PATENTS LLC,

Plaintiff,

v.

VERIZON COMMUNICATIONS, INC., CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS, and VERIZON ONLINE, LLC,

Defendants.

CIVIL ACTION NO. 4:23-cv-304-ALM

#### **JURY TRIAL DEMANDED**

### JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

The parties have conferred regarding a proposed protective order and hereby submit an agreed protective order, attached as Exhibit A.

Dated: November 6, 2023 Respectfully submitted,

/s/ Zachariah S. Harrington\_\_

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### **CERTIFICATE OF SERVICE**

I hereby certify that on the 6th day of November 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Zachariah S. Harrington
Zachariah S. Harrington

# **CERTIFICATE OF CONFERENCE**

I hereby certify that counsel for Plaintiff has complied with the meet and confer requirement in Local Rule CV-7(h) and conferred with Defendants' counsel, who confirm that this is a joint motion.

/s/ Zachariah S. Harrington
Zachariah S. Harrington